



U.S. Department of Justice

United States Attorney  
Southern District of New York

26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278

February 14, 2025

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Sikkema*, 24 Cr. 227 (ER)**

Dear Judge Ramos:

The Government writes to notify the Court that on Monday, February 10, 2025, a superseding indictment (the “Superseding Indictment”) was filed against the defendant in the above matter. The Superseding Indictment added three charges against the defendant, specifically, (1) murder-for-hire conspiracy resulting in death, in violation of 18 U.S.C. §§ 1958 and 2; (2) murder-for-hire resulting in death, in violation of 18 U.S.C. §§ 1958 and 2; and (3) conspiracy to murder and maim a person in a foreign country, in violation of 18 U.S.C. §§ 956(a)(1) and (a)(2)(A). On February 11, 2025, the defendant was arrested on the Superseding Indictment and was presented, arraigned, and ordered detained by Magistrate Judge Stewart D. Aaron.<sup>1</sup>

Given the expanded charges in the Superseding Indictment, the Government respectfully requests that the Court schedule a conference to address those charges and their impact on discovery and other deadlines in this case. At such a conference, the Government would be prepared to update the Court and the defense on the status of its production of additional Rule 16 discovery related to the Superseding Indictment.<sup>2</sup>

The Government has conferred with defense counsel, and the parties are both available for such a conference next week between 3pm to 4pm on Tuesday, February 18, between 10am to 5pm on Wednesday, February 19, and between 3pm to 5pm on Thursday, February 20. If none of

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<sup>1</sup> Judge Aaron excluded time through April 17, 2025, the date of the final pretrial conference in this matter.

<sup>2</sup> As the Court is aware, and as the Government has since made defense counsel aware, this Court previously granted the Government’s request for delayed discovery of material related to the Government’s criminal investigation of the defendant for his involvement in the murder of his estranged husband in Brazil until either charges were filed in connection with that conduct or further order of the Court. Because charges have now been filed in connection with that conduct, the Government is in the process of preparing additional Rule 16 material for production to the defense.

those dates and times work for the Court, the parties can propose additional times the following week.

Respectfully submitted,

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Acting United States Attorney

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cc: Counsel of record (by ECF)